UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

JOHN NANNI,)
Plaintiff,))
v.) Case No. 2:14-cv-06805-MAK
DDR NOBLE TC TRUST,) Hon. Mark A. Kearney
Defendant.)) /

MOTION FOR PRO HAC VICE ADMISSION OF BRIAN T. KU

Pursuant to Local Civil Rule 83.5.2(b), plaintiff John Nanni hereby moves for the *pro hac vice* admission of attorney Brian T. Ku, a partner at the law firm of Ku & Mussman, P.A. and submits the following in support thereof:

- The motion for *pro hac vice* admission of Brian T. Ku filed on March 31, 2015 (Dkt. No. 24), including the "Application Form for Those Attorneys Seeking to Practice in This Court Pursuant to Local Rule of Civil Procedure 83.5.2(b)," is incorporated by reference and resubmitted herewith.
- 2. The undersigned counsel is admitted to practice and in good standing before this Court, and has appeared in the above-captioned case. *See* Section II of the "Application Form for Those Attorneys Seeking to Practice in This Court Pursuant to Local Rule of Civil Procedure 83.5.2(b)," (Sponsor's statement).
- 3. This motion is made at the request of plaintiff John Nanni, because Mr. Ku has served as defendant's national counsel in cases arising under Title III of the Americans with Disabilities Act and is familiar with the facts underlying this litigation. His assistance and participation is necessary to John Nanni's representation in this proceeding.
- 4. Counsel for defendant DDR Noble TC Trust does consent to this motion.

Dated: June 1, 2015.

Respectfully Submitted,

By: /s/ J. Christopher Froelich_

KU & MUSSMAN, P.A. Attorney for Plaintiff J. Christopher Froelich Of Counsel PA Bar ID No.: 77409 116 E. Penn Avenue

> Robesonia, PA 19551 Tel: (610) 693-5520 Fax: (610) 693-5590 cfroelich@verizon.net

Counsel for Plaintiff John Nanni

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

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DECLARATION OF BRIAN T. KU IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION

- 1. I am an attorney for Plaintiff John Nanni and a partner at Ku & Mussman, P.A. I submit this Declaration to the Court in support of Plaintiff's motion for my *pro hac vice* admission to practice before this Court.
- 2. I have been admitted to practice in the following jurisdictions, and am an active member in good standing of each jurisdiction listed:
 - A. I state that I am currently admitted to practice in the following state jurisdictions:

Florida	10/28/2002	610461
(State where admitted)	(Admission date)	(Attorney Identification Number)
District of Columbia	03/18/2011	999543
(State where admitted)	(Admission date)	(Attorney Identification Number)
New York	05/16/2014	883690
(State where admitted)	(Admission date)	(Attorney Identification Number)

B. I state that I am currently admitted to practice in the following federal jurisdictions:

Southern Dist. of FL	01/27/2005	FL 610461
(Court where admitted)	(Admission date)	(Attorney Identification Number)
Middle Dist. of FL	09/11/2007	FL 610461
(Court where admitted)	(Admission date)	(Attorney Identification Number)
Dist. of Connecticut	10/05/2007	FL 610461
(Court where admitted)	(Admission date)	(Attorney Identification Number)

3. I have never been suspended from the practice of law in any jurisdiction, not have I ever

received any public reprimand by the disciplinary authority of any bar of which I am a member.

- I have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court. I agree to be bound by these Rules for the duration of the above-captioned case.
- If granted the pro hac vice sought herein, I will in good faith continue to advise my associate counsel, J. Christopher Froelich, of the current status of this case and of all material developments therein.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of June, 2015.

Brian T. Ku, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2015, I electronically filed the foregoing, using the CM/ECF system and a true and correct copy has been by U.S. Mail to:

Carl W. Hittinger, Esq. M. Mitchell Oates, Esq. Jeffry W. Duffy, Esq. Baker & Hostetler, LLP Cira Centre, 12th Floor 2929 Arch Street Philadelphia, PA 19104

Brian C. Blair, Esq. Baker & Hostetler, LLP 200 South Orange Avenue, Suite 2300 Orlando, FL 32801

By: <u>/s/ J. Christopher Froelich</u>
J. Christopher Froelich, Esq.